



Advocates for Workplace Fairness

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September 5, 2023

Via ECF

The Honorable Nelson S. Roman
 United States District Judge
 Southern District of New York
 300 Quarrapas St.
 White Plains, New York 10601-4150

Re: Dail Moses-Taylor v. Greyston Foundation, Inc., Case No. 1:21-cv-06756

Dear Judge Roman:

We represent the Plaintiff Dail Moses-Taylor in the above-referenced matter. Consistent with past practice, Defendant has violated yet another Court-ordered deadline (August 30, 2023 to respond to Plaintiff's August 24 letter motion, *see* Dkt. 69) and Plaintiff still has not received the long overdue settlement sums, nor any communication from Defendant's counsel regarding the status of the payments. As described in Plaintiff's prior correspondence to the Court (*see, e.g.,* Dkts. 61, 63, 67, 68), it is clear that Defendant and its counsel feel entitled to violate their legal obligations and otherwise have no respect for this Court or the judicial process. It is also clear that Defendant has no intention of honoring the parties' Agreement and paying the settlement sums. Given these grossly unfair but sadly predictable circumstances, Plaintiff respectfully asks that the Court grant her pending letter motion seeking enforcement of the parties' Agreement and ordering Defendant or its counsel to pay sanctions (*see* Dkt. 68).

We thank the Court for its consideration of this matter.

Plaintiff's request is GRANTED to the extent Plaintiff is granted leave to file a motion for enforcement of the settlement agreement at ECF No. 59. The briefing schedule is as follows: Plaintiff's motion is to be served, not filed, by Oct. 5, 2023; Defendant's opposition is to be served, not filed, by Nov. 6, 2023; and Plaintiff's reply is to be served by Nov. 21, 2023. All moving papers are to be filed on Nov. 21, 2023.

SO ORDERED:

 A handwritten signature of Hon. Nelson S. Roman in blue ink, positioned over a printed nameplate.

HON. NELSON S. ROMAN
 UNITED STATES DISTRICT JUDGE

Dated: September 5, 2023

White Plains, New York

cc: All Parties (via ECF)

Respectfully submitted,

A handwritten signature of Allison L. Van Kampen in blue ink, positioned above a horizontal line.

Allison L. Van Kampen
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 New York, NY 10017
Counsel for the Plaintiff

MEMO ENDORSED